

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE:	§	
	§	
Perfect Aqua Purifier LLC,	§	Case No. 16-10621-HCM
	§	
Debtor	§	Chapter 7
-----	§	
John Patrick Lowe, Trustee,	§	
Plaintiff	§	
	§	
v.	§	Adv. Pro. No. 16-1111-HCM
	§	
Union Square Media Group, LLC,	§	
Defendant	§	

Motion for Entry of Default Judgment Against Union Square Media Group, LLC

TO THE HONORABLE H. CHRISTOPHER MOTT, UNITED STATES BANKRUPTCY JUDGE:

Comes now JOHN PATRICK LOWE, Trustee in Bankruptcy, Plaintiff, and files this Motion for Entry of Default Judgment Against Union Square Media Group, LLC, and respectfully represents as follows:

1.

The Plaintiff filed an original Complaint to Avoid and Recover Preferential Transfers and For Disallowance of a Proof of Claim. A true and correct copy of the Complaint is attached to this Motion as Exhibit "A" and incorporated herein by reference. A Summons and Complaint were served upon Union Square Media Group, LLC, Defendant, pursuant to the bankruptcy rules, as follows:

- a. Summons issued February 8, 2017, and served, along with the Complaint, on February

8, 2017, on Union Square Media Group, LLC, c/o CT Corporation System, Registered Agent, 155 Federal Street, Suite 700, Boston, MA 02110, by certified mail, return receipt requested. The green card was signed and returned to the Plaintiff by the United States Postal Service on February 16, 2017.

b. Summons issued February 16, 2017, and served, along with the Complaint, on February 16, 2017, on Union Square Media Group, LLC, c/o Sarah de Diego, General Counsel, 1223 Wilshire Blvd. 148, Santa Monica, CA 90403, by certified mail, return receipt requested. The green card was signed by Bill Giese and returned to the Plaintiff by the United States Postal Service on “Rosa” on February 27, 2017.

No response, either by answer or motion, was served upon the Plaintiff within thirty (30) days of the date of issuance of the Summonses.

2.

Plaintiff requests that the Court enter a default judgment in favor of the Plaintiff and against the Defendant in this cause as a response by motion or answer was not timely filed, entering a judgment in favor of the Plaintiff and against the Defendant for the amount of \$30,000.00, plus interest as allowed by law, and awarding Plaintiff costs of Court.

3.

Plaintiff also requests that the Court disallow the Proof of Claim of Union Square Media Group, LLC.

WHEREFORE, premises considered, Movant prays that a default judgment be entered by the Court as to the Defendant as requested in this Motion.

DATED: March ~~22~~
23, 2017.

Respectfully submitted



John Patrick Lowe, Trustee, Plaintiff
State Bar No. 12623700
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Uvalde, Texas 78801
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(830) 278-7643 (fax)
Email: pat.lowe.law@gmail.com

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing Motion for Default Judgment Against Union Square Media Group, LLC, and the proposed Default Judgment, have been served on the parties listed below, by First Class mail, postage prepaid; by the CM/ECF system; or by electronic mail on this the ~~22nd~~
23rd day of March 2017:

Defendant:

Union Square Media Group, LLC
c/o Sarah de Diego
General Counsel
1223 Wilshire Blvd. 148
Santa Monica, CA 90403
Certified Mail #7016 2710 0000 8313 9875
Return Receipt Requested
and by Regular Mail

Union Square Media Group, LLC
c/o CT Corporation System, Registered Agent
155 Federal Street, Ste. 700
Boston, MA 02110
Certified Mail #7016 2710 0000 8313 9899
Return Receipt Requested
and by Regular Mail



Patrick Lowe, Trustee